

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE - WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE
TATE, JEREMY S. MELTON, ISSACCA POWELL,
KEITH BURGESS, TRAVIS BOYD, TERRENCE
DRAIN, and KIMBERLY ALLEN on behalf of
themselves and all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity as former
Sheriff of Shelby County, Tennessee; FLOYD BONNER,
JR., in his official capacity as Sheriff of Shelby County,
Tennessee; ROBERT MOORE, in his individual capacity
as former Jail Director of Shelby County, Tennessee;
KIRK FIELDS, in his official capacity as Jail Director of
Shelby County, Tennessee; CHARLENE McGHEE, in
her individual capacity as former Assistant Chief of Jail
Security of Shelby County, Tennessee; REGINALD
HUBBARD, in his official capacity as Assistant Chief of
Jail Security of Shelby County, Tennessee; DEBRA
HAMMONS, in her individual capacity as former
Assistant Chief of Jail Programs of Shelby County,
Tennessee; TIFFANY WARD in her official capacity as
Assistant Chief of Jail Programs of Shelby County,
Tennessee; SHELBY COUNTY, TENNESSEE, a
Tennessee municipality; TYLER TECHNOLOGIES,
INC., a foreign corporation; GLOBAL TEL*LINK
CORPORATION, a foreign corporation; SOFTWARE
AG USA, INC., a foreign corporation; and SIERRA-
CEDAR, INC., a foreign corporation, SIERRA
SYSTEMS GROUP, INC., a foreign corporation.

Defendants.

**Case No. 2:16-cv-2907-
SHM/tmp**

**DECLARATION OF F.
SCOTT CONAWAY**

**DECLARATION OF F. SCOTT CONAWAY
CONFIRMING NO OPT-OUTS NOR OBJECTIONS**

I, F. Scott Conaway, being duly sworn, depose and say under oath as follows:

1. My name is F. Scott Conaway, and I am an adult resident and citizen of the State of Tennessee. I am the managing member of CMM Settlement Solutions, LLC (hereinafter “CMM”), which was appointed by this Court to serve as the Notice and Claims Administrator in this case. I am responsible for supervising all class action administration services provided by CMM, am personally involved in the management of the administration of this proposed class action settlement and, therefore, have personal knowledge of the facts set forth herein below.

2. In its August 11, 2021, Order Granting Motion for Preliminary Approval of Class Action Settlement (“the Order”), the Court set certain deadlines for class members to seek to exclude themselves from or “opt-out” of this proposed settlement and certain deadlines for objecting to the terms of the proposed class settlement. Specifically, pursuant to paragraph 10 of the Order, any class members seeking to exclude themselves from or “opt-out” of the settlement were required to submit a written request to CMM within thirty (30) days of entry of the Order, which was on or before September 12, 2021. In addition, pursuant to paragraph 11 of the Order, class members seeking to object to the terms of this proposed settlement were required to file with the Court and send a written objection to CMM no later than thirty (30) days before the Final Fairness Hearing date set by the Court. Pursuant to paragraph 7 of the Order, the Final Fairness Hearing is to be heard on November 10, 2021. As a result, any and all objections to the proposed settlement had to be filed with the Court and mailed to CMM – at the latest - on or before October 12, 2021.¹

3. As of this date, October 27, 2021, CMM has not received any request for exclusion or “opt-out” by any person nor has it received any type of objection from any person or entity

¹ The 30th day fell on Sunday October 10; Monday October 11 was a federal holiday. Thus, the latest date that an objection would have been timely was Tuesday October 12, 2021.

related to the proposed settlement. Moreover, I have checked the Court's PACER system and no objection has been filed in this case.

I, F. Scott Conaway, declare under penalty of perjury that the foregoing is true and correct.



F. SCOTT CONAWAY

EXECUTED ON: 10/29/21